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Attorneys for Defendants,  
Deniro Marketing, LLC, Allan Henning,  
Modena Marketing Inc. and Deltabreeze Holdings Ltd.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ROBERT BADELLA, individually and on  
behalf of all persons similarly situated,  
BRADLEY AUG, individually and on behalf of  
all persons similarly situated, LOUIS FEBUS,  
individually and on behalf of all persons  
similarly situated, ROBERT LANGFORD,  
individually and on behalf of all persons  
similarly situated, MICHAEL SHANE YORK,  
individually and on behalf of all persons  
similarly situated, and ROBERT W. JEFFRIES,  
individually and on behalf of all persons  
similarly situated,

Plaintiffs,

v.

DENIRO MARKETING, LLC, a California  
limited liability company, ALAN HENNING,  
an individual, MODENA MARKETING INC.,  
an Antigua and Barbuda corporation, THOMAS  
JONES, an individual, PIRANHA NEW  
MEDIA LTD., a United Kingdom corporation,  
DELTABREEZE HOLDINGS LTD., a Cyprus  
corporation, PEN HELP LTD., a United  
Kingdom corporation, and DOES 1-100,

Defendants.

Case No. 3:10-cv-03908-CRB

Hon. Charles R. Breyer

**STIPULATED REQUEST FOR AN ORDER  
EXTENDING TIME FOR DEFENDANTS  
TO FILE REPLY MEMORANDUMS IN  
SUPPORT OF THEIR MOTIONS TO  
DISMISS**

**(PURSUANT TO LOCAL RULE 6-2; FIRST  
REQUEST)**

**Hearing Date: January 21, 2011 (Friday)**

**Time: 10:00 a.m.**

**Crtrm: 8**

1 Plaintiffs and Defendants stipulate by and through their respective counsel of record as follows:

2 WHEREAS, on December 1, 2010, Deniro Marketing, LLC, Allan Henning, Modena  
3 Marketing Inc. and Deltabreeze Holdings Ltd. filed motions to dismiss Plaintiffs' complaint pursuant  
4 to Federal Rules of Civil Procedure 12(b)(6), 12(b)(2) and 9(b);

5 WHEREAS, the hearing on Defendants' motions is currently set for January 21, 2011 at 10:00  
6 a.m. in Courtroom 8 of the above-entitled court;

7 WHEREAS, Plaintiffs filed their oppositions to Defendants' motions on January 3, 2011. As a  
8 result, Defendants will have only four days within which to analyze Plaintiffs' oppositions and draft  
9 and file their replies (the current due date is January 7, 2011);

10 WHEREAS, Plaintiffs and Defendants agree that Defendants may have an additional three days  
11 to file and serve their respective reply memorandums, up to and including January 10, 2011;

12 WHEREAS, this is Defendants' first request for an extension of time to file and serve their  
13 respective reply memorandums;

14 WHEREAS, the requested extension of time will result in the Court's losing one (1) business  
15 day within which to review the reply memorandums;

16 THEREFORE, Plaintiffs and Defendants hereby request that the Court grant Defendants an  
17 extension of time within which to file and serve their respective reply memorandums in response to  
18 Plaintiffs' oppositions, up to and including January 10, 2011.

19  
20 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

21 Dated: January 4, 2011

THE KAUFMAN LAW GROUP

22  
23 By: \_\_\_\_\_/s/\_\_\_\_\_

24 Gary Jay Kaufman  
Attorneys for Defendants

25 Dated: January 4, 2011

GARBARINI LAW GROUP P.C.

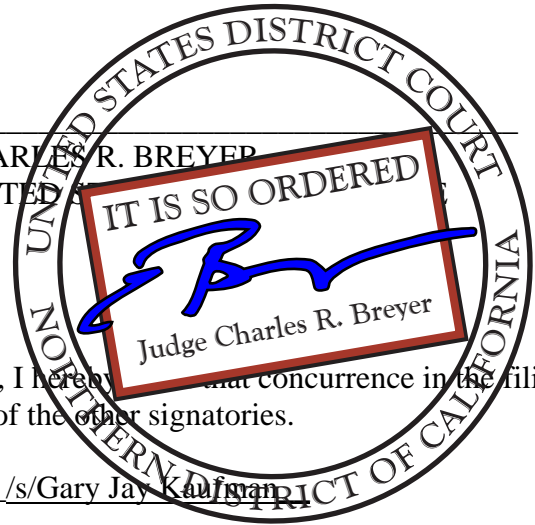
26  
27 By: \_\_\_\_\_/s/\_\_\_\_\_

28 Richard Garbarini, with permission  
Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: January 6, 2011

CHARLES R. BREYER  
UNITED STATES



ATTESTATION: Pursuant to General Order 45, § 10(B), I hereby attest that concurrence in the filing of the foregoing document has been obtained from each of the other signatories.

Dated: January 4, 2011

/s/ Gary Jay Kaufman